

EXHIBIT 1

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.; 17-cv-00939-WHA

OTTOMOTTO, LLC; OTTO

TRUCKING LLC,

Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF PAUL FRENCH

San Francisco, California

Tuesday, October 3, 2017

Volume I

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2715705

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1 method -- you talk about the methodology of -- I'm 01:34:38
2 sorry, I have the wrong report in front of me.
3 You say, "Based on the evidence I have
4 reviewed, it is my understanding that the overall
5 investigation into the former employees began as 01:34:52
6 early as August 4th, 2015".
7 So it's your understanding that the
8 foren- -- that the investigation into
9 Mr. Levandowski and other employees who left Waymo
10 for Otto began in August of 2015? 01:35:10
11 A. That's my understanding.
12 Q. At that stage, who were the former
13 employees who had left the company?
14 MR. BAKER: Objection to form.
15 THE DEPONENT: I don't know. 01:35:31
16 Q. (By Mr. Boock) In 2 -- in August
17 of 2015, was Anthony Levandowski still employed by
18 Google?
19 MR. BAKER: Objection to form.
20 THE DEPONENT: I am not sure. 01:35:45
21 Q. (By Mr. Boock) And by Google, I mean
22 Google or Waymo.
23 Can you identify any documents that show
24 that the investigation that you claimed again in
25 August of 2015 was tied to the investigation 01:35:55

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1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

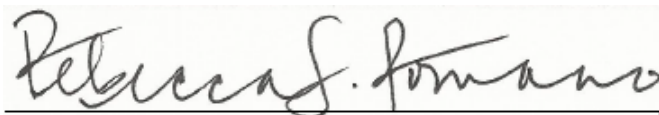
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath;
8 that a record of the proceedings was made by me
9 using machine shorthand which was thereafter
10 transcribed under my direction; that the foregoing
11 transcript is true record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [x] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: October 4, 2017

22
23 

24 Rebecca L. Romano, RPR,
25 CSR. No 12546